

U.S. Department of Justice

Washington, DC 20530

Exhibit A to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.* for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

| | | | | | | | | |
|--|--|---------------------------------|--------------------------------------|------------------------------------|--------------------------------------|--|--------------------------------------|--|
| 1. Name and Address of Registrant Sanitas International Inc. 1101 Pennsylvania Ave, 5th Floor Washington DC 20001 | | 2. Registration No. 5963 | | | | | | |
| 3. Name of Foreign Principal South African Democracy Network (SADN) | 4. Principal Address of Foreign Principal P.O. Box 91199 Auckland Park 20006 Johannesburg, South Africa | | | | | | | |
| 5. Indicate whether your foreign principal is one of the following: | | | | | | | | |
| <input type="checkbox"/> Foreign government <input type="checkbox"/> Foreign political party <input checked="" type="checkbox"/> Foreign or domestic organization: If either, check one of the following: <table border="0"> <tr> <td><input type="checkbox"/> Partnership</td> <td><input type="checkbox"/> Committee</td> </tr> <tr> <td><input type="checkbox"/> Corporation</td> <td><input type="checkbox"/> Voluntary group</td> </tr> <tr> <td><input type="checkbox"/> Association</td> <td><input checked="" type="checkbox"/> Other (specify) <u>Non-governmental organization</u></td> </tr> </table> | | | <input type="checkbox"/> Partnership | <input type="checkbox"/> Committee | <input type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group | <input type="checkbox"/> Association | <input checked="" type="checkbox"/> Other (specify) <u>Non-governmental organization</u> |
| <input type="checkbox"/> Partnership | <input type="checkbox"/> Committee | | | | | | | |
| <input type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group | | | | | | | |
| <input type="checkbox"/> Association | <input checked="" type="checkbox"/> Other (specify) <u>Non-governmental organization</u> | | | | | | | |
| <input type="checkbox"/> Individual-State nationality _____ | | | | | | | | |
| 6. If the foreign principal is a foreign government, state: | | | | | | | | |
| a) Branch or agency represented by the registrant _____ | | | | | | | | |
| b) Name and title of official with whom registrant deals _____ | | | | | | | | |
| 7. If the foreign principal is a foreign political party, state: | | | | | | | | |
| a) Principal address _____ | | | | | | | | |
| b) Name and title of official with whom registrant deals _____ | | | | | | | | |
| c) Principal aim _____ | | | | | | | | |

Formerly CRM-157

FORM NSD-3
Revised 03/11

8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

SADN is a non-governmental organization which is focused on promoting free, fair and peaceful elections in Zimbabwe.

b) Is this foreign principal:

| | |
|---|---|
| Supervised by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Owned by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Directed by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Controlled by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Financed by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Subsidized in part by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |


9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page must be used.)

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

Roy Bennett, democracy advocate and former Member of Parliament in Zimbabwe, founded and operates the SADN.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

| | | |
|-----------------------------------|--|--|
| Date of Exhibit A 29 June 2013 | Name and Title Christopher M. Harvin, Partner | Signature  |
|-----------------------------------|--|--|

U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <http://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <http://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <http://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterespionage Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

| | |
|---|-----------------------------|
| 1. Name of Registrant Sanitas International Inc. | 2. Registration No. 5963 |
|---|-----------------------------|

3. Name of Foreign Principal
South African Democracy Network (SADN)

Check Appropriate Box:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

The actual scope of work, terms of agreement, timetable for implementation, and fees for said services and additional expenses will be based on a follow up agreement.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Sanitas International will focus efforts to build awareness and strengthen interest with Western Audiences (U.S, U.K and Europe) to communicate current events in Zimbabwe, promote democracy and improve the lives of all Zimbabweans. Part of this effort will be to assist SADN in a robust US-based communications and outreach program leading up and following the 2013 elections in Zimbabwe.

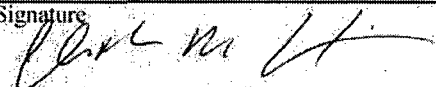
9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Sanitas International will provide outreach to include top-tier media, Congress, the Obama Administration and other key audiences. A key component of this outreach will be to build support and advocates for a free, fair and peaceful election in Zimbabwe - including current and former US government officials.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

| | | |
|-----------------------------------|---|---|
| Date of Exhibit B 29 June 2013 | Name and Title Christopher M. Harvin | Signature  |
|-----------------------------------|---|---|

Footnote: Political activity as defined in Section 1(o) of the Act means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.



15 June 2013

RE: Media and Stakeholder Engagement for the South African Development Network (SADN)

Per our recent conversations, Sanitas International Inc. (Sanitas) is honored to support the South African Development Network (SADN) during this critical transition period in Zimbabwe politics.

This letter is to confirm that then SADN wishes to retain Sanitas for media relations and stakeholder outreach to build support for peaceful, free and fair elections in Zimbabwe. Our team of experts will focus efforts to build awareness and strengthen interest with Western Audiences (U.S, U.K and Europe) to communicate current events in Zimbabwe, promote democracy and improve the lives of all Zimbabweans. Part of this effort will be to assist in a robust US-based communications and government affairs program in the previous ways we have discussed and to look at other areas of opportunity and coordination.

The actual scope of work, terms of agreement, timetable for implementation, and fees for said services and additional expenses will be based on a follow up agreement as a detailed scope of work being now being negotiated.

Sanitas International looks forward to helping you achieve your goals and the with a wide range of audiences and stakeholders to include top-tier media, Congress, the Obama Administration and other key audiences. We also look forward to a long and productive relationship with you and we are eager to start working on your behalf and on behalf of the people of Zimbabwe.

Please sign this letter and return it to the address given below. Work will start upon our receipt of this letter, finalization of the scope of work and upon receipt of the agreed upon fees.

Very truly yours,

On behalf of the Sanitas Team

I have read the above letter and agree and accept the terms and the conditions set forth therein.

Handwritten signature of Christopher Harvin in black ink.

Signature: _____

15 June 2013

Christopher Harvin, Partner

Sanitas International, Inc.

Handwritten signature of a representative in black ink.

Signature: _____

15 June 2013

Representative

South African Development (SADN)